

EXHIBIT 18

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY
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4 _____
5)
IN RE: JOHNSON & JOHNSON TALCUM)
6 POWDER PRODUCTS MARKETING, SALES)
PRACTICES, AND PRODUCTS LIABILITY)
7 LITIGATION)
) MDL No.
8) 2738 (FLW)(LHG)
)
9 _____)

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11
12 VIDEOTAPED DEPOSITION OF
13 REBECCA SMITH-BINDMAN, M.D.
14 San Francisco, California
15 Thursday, February 7, 2019
16 Volume I
17
18
19
20
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22

23 Reported by:
MARY J. GOFF
24 CSR No. 13427
25

1 awful lot of Johnson & Johnson baby powder over the
2 last 50 plus years. And -- and I am --

3 Q (BY MR. ZELLERS) And --

4 A -- not sure whether there's lots of other
5 dominant players in the space. I -- I don't know
6 that.

7 My impression is that Johnson -- baby
8 powder baby is a Johnson & Johnson a product very,
9 very often.

10 Q But you have not done any type of survey
11 --

12 A I have --

13 Q -- or analysis?

14 A -- I have not.

15 Q If the biological mechanism by which a
16 talcum powder product can increase the risk of
17 ovarian cancer is because of a particular
18 contaminant or collection of contaminants, but that
19 contaminant or collection of contaminants does not
20 exist in all talcum powder products, will the
21 epidemiologic evidence that exists today allow you
22 to see that distinction?

23 MS. O'DELL: Object to the form.

24 A You're asking about contaminants of talcum
25 powder products. My understanding from what I have

1 reviewed is that the components of talcum powder
2 products include asbestos, include fibrous talc,
3 include heavy metals, include fragrances.

4 Let's get rid of the header -- the --
5 the fragrances. Just the heavy metals, the
6 asbestos, and the fibrous talc. My understanding is
7 that those are in the same mines as the platy talc,
8 which is the desired part of talc.

9 To the degree that those are all part and
10 parcel of the same product, they're not -- I
11 wouldn't think of them as contaminants. I would
12 think of them as just part of the product.

13 And so to the degree that that product
14 cannot be separated, I would be concerned that any
15 talcum powder products have all of the above.

16 I separated fragrance, because that's
17 something that's added. That's not mined directly.
18 But the other items, my understanding is that's part
19 of the talc.

20 Q You don't know one way or the other
21 whether talcum powder products contain asbestos, do
22 you?

23 MS. O'DELL: Object to the form.

24 A You're asking me to opine whether talcum
25 powder products contain asbestos?